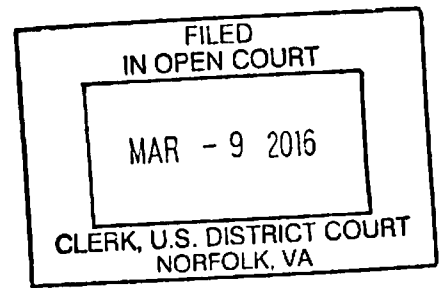


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division



UNITED STATES OF AMERICA

v.

KEYON SHAKEEM VAUGHAN,

Defendant.

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CRIMINAL NO. 2:15cr45

STATEMENT OF FACTS

The parties stipulate that the allegations in Counts 1 and 3 of the pending indictment, and the following facts are true and correct, and that had the matter gone to trial, the United States would have proven them beyond a reasonable doubt.

On or about October 14, 2014, in Chesapeake, Virginia, within the Eastern District of Virginia, the defendant, KEYON SHAKEEM VAUGHAN, conspired with a juvenile and another unindicted individual who goes by the name of Johnny, to commit an armed robbery of a Zero's Sub's on Portsmouth Boulevard.

The defendant and the juvenile entered the Zero Subs armed with pistols while Johnny waited for them in the get-a-way vehicle. The defendant and the juvenile brandished the firearms at the employees and ordered them to get down on the ground. The defendant took approximately \$1200.00 out of the cash register and took one of the employee's cell phones. During the course of the robbery the defendant left a footprint on the store counter that matches his sneakers. The defendant and the juvenile then fled the store and got into the get-a-way vehicle driven by Johnny.

Two citizens observed the defendant and the juvenile flee from the Zero's Subs with a bag in their hand and get into the get-a-way vehicle. This seemed suspicious to them so they followed the vehicle as it drove down Portsmouth Boulevard. When the vehicle turned down Dock

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Landing Road they stopped their pursuit. They relayed this information to a nearby patrol officer and told him that the get-a-way vehicle is a dark colored Honda Civic with temporary tags.

The patrol officer spotted a vehicle fitting this description in the Holly Cove neighborhood of Chesapeake. The vehicle was parked along the side of the road so the officer pulled up behind the vehicle and shined his spot light into the vehicle. He noticed two occupants in the vehicle. The intent of the officer was to approach the vehicle, but before he could the vehicle pulled away from the curb. The officer turned on his emergency lights in an attempt to pull the vehicle over. On several occasions the vehicle pulled over and then took off again. Eventually the two occupants of the vehicle jumped out and fled into some nearby woods.

Other officers appeared at the scene including a canine unit. When the suspects learned that a canine was on the scene they came out of the woods and surrendered. One of the suspects was the defendant and the other was the juvenile. Inside the Honda the police found the cell phone taken from the employee.

In a *Mirandized* statement the defendant confessed to the armed robbery. He said that he and the juvenile went inside to do the robbery while Johnny stayed in the automobile. He said they were armed with firearms that had been given to them by Johnny. He said that it was Johnny's idea to do the robbery. The defendant admitted to taking the money and the cell phone. He said that when they fled to the Holly Cove neighborhood that Johnny got out of the car and left before the police arrived.

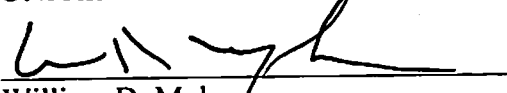
The Zero's Sub sells products that have crossed over state lines therefore the robbery affects commerce as defined in 18 U.S.C. § 1951(b)(3).

KLK
ASL
LNY

These events occurred in the Eastern District of Virginia.

DANA J. BOENTE
UNITED STATES ATTORNEY

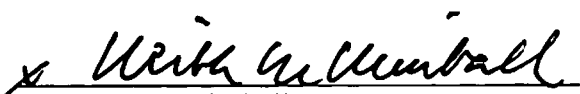
By:


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Defendant's Signature: After consulting with my attorney and pursuant to the plea agreement entered into this day between myself, the United States and my attorney, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.


KEYON SHAKEEM VAUGHAN
Defendant

Defense Counsel's Signature: I am the attorney for KEYON SHAKEEM VAUGHAN. I have carefully reviewed the above Statement of Facts with him. To the best of my knowledge, his decision to stipulate to these facts is an informed and voluntary one.


Keith Loren Kimball
Supervisory Assistant Federal Public Defender